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NAS WHITING FIELD
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON SITE 14 RECORD OF DECISION NAS WHITING FIELD FL
8/18/2006
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

From: [Cason, James](#)
To: [Sarah Reed \(E-mail\)](#)
Cc: [Craig Benedikt \(E-mail\)](#); [Larry Smith \(E-mail\)](#); [Ron Joyner \(E-mail\)](#)
Subject: Draft ROD for Site 14
Date: Friday, August 18, 2006 10:22:15 AM
Attachments: [14ROD0706.doc](#)

I have sent the attached letter up for signatures. It might be changed, but not usually.

For the record, I have include my preference for Land Use Controls since this is a sanitary landfill, hopefully it will "head off" internal discussion here in that regard.

Jim

<<14ROD0706.doc>>

Jim Cason

James H. Cason, P.G.
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The four Golden Rules for site assessment/remediation:

For soil, delineate completely and dig to "clean," or dig out what you will and take confirmatory samples to prove you dug to "clean."

Delineate all contamination in all media vertically and horizontally.

For LUC sites, if for the Industrial scenario, delineate to Residential (not necessarily the site boundary originally designated).

Now, after all this, don't forget leachability.

On Geochemical Protocols:

"Alternative approaches in which data are pooled and then attempts are made to sort specific samples into either 'background' or 'affected' categories have serious problems and should be avoided."

"It is important that site soil and background soil samples be matched as closely as possible with respect to the geochemistry of trace metals being considered."

"Taking background samples locally will satisfy requirements in Chapter 62-780, F.A.C., which defines 'background concentrations' for use in risk assessment as coming from samples taken 'in the vicinity' of the site."

Please Note: Florida has a very broad public records law. Most written

communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail is communications and may therefore be subject to public disclosure.



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

August 18, 2006

Ms. Sarah Reed
Department of the Navy, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, South Carolina 29419-9010

file: 14ROD0706.doc

RE: Draft Record of Decision – Surface and Subsurface Soils at Site 14, Short-Term Sanitary Landfill, Revision 1, Naval Air Station Whiting Field

Dear Ms. Reed:

I have reviewed the above document dated July 2006 (received August 10, 2006). The document is generally acceptable; however, please consider the following in the final document:

1. Page IV, Table of Contents: remove the “NA” in 2.10.2.
2. Page 2-3 and in References: please reference the FDEP letter, “FDEP 2001” concerning soil characteristics at NASWF. The present reference “FDEP 2001” probably is not needed since the Navy has chosen to ignore it.
3. Page 2-9, Section 2.8, Description of Alternatives: in describing Alternative 1 in two places, only “NA” is used. Please use the term “No Action” instead of the acronym because it detracts from the meaning of the paragraph. This also applies to Section 2.10.2: it is a fourteen-word paragraph, and two more words will improve the explanation. In the future, please consider limiting the use of acronyms, especially when discussing the Alternatives and the Chosen Remedy for sites.

While I cannot formally object to the remedy choice of No Action for this site, the fact remains that it was a sanitary landfill, if only for a short time. Because of this, I would be more comfortable with Land Use Controls as the remedy because the use of the site as a sanitary landfill should be taken into account if the Navy, or any other subsequent landowner, contemplates construction on, or other use of, the site. I would be greatly concerned if this site had been used for a long-term sanitary landfill, primarily because of engineering considerations if construction was contemplated and for safety concerns from landfill gases in associated buildings or residential sites.

Ms. Sarah Reed
August 18, 2006
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Thank you for the opportunity to review this document. If you need additional information or further clarification, please feel free to call me at 850-245-8999.

Sincerely,

James H. Cason, P.G.
Remedial Project Manager

CC: Craig Benedikt, US EPA Region IV, Atlanta
Ron Joyner, NAS Whiting Field
Larry Smith, TetraTech, Tallahassee

ESN____JJC____